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Attorneys for Defendant
American Council of Learned Societies

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

-----X	
JOSHUA KATZ,	:
	:
Plaintiff,	:
	:
- v. -	:
	:
AMERICAN COUNCIL OF LEARNED	:
SOCIETIES,	:
Defendant.	:
	:
	:
	:
	:
	:
-----X	

**Civil Action No. 1:21 CV 04306
(AET)**

DECLARATION OF JAMES SHULMAN IN SUPPORT OF
MOTION TO DISMISS OF AMERICAN COUNCIL OF LEARNED
SOCIETIES

JAMES SHULMAN pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I am over eighteen years of age and competent to make the following statements. The facts stated herein are true and correct and are based on my

personal knowledge.

2. I am employed as the Vice President and Chief Operating Officer at the American Council of Learned Societies (“ACLS”). ACLS is a leader in American scholarship in the humanities and related social sciences and holds a core belief that knowledge is a public good. As such, ACLS strives to promote the circulation of humanistic knowledge throughout society. In addition to stewarding and representing its member organizations, ACLS supports scholarship in the humanities and social sciences and advocates for the centrality of the humanities in the modern world.

3. As the Vice President and Chief Operating Officer, I work with the President to develop, execute and implement ACLS’s strategic initiatives. I am responsible for overseeing day-to-day ACLS administrative functions, and leading ACLS operational functions, including ACLS’s finances, human resources, information technology, compliance, facilities and real estate.

4. ACLS is a 501(c)(3) nonprofit organized and existing under the laws of District of Columbia, with its principal place of business located in New York City, New York.

5. ACLS does not own any property or have any offices in New Jersey.

6. A small handful of ACLS employees periodically work from their homes in New Jersey. None of these employees were involved in the discussions

between ALCS and Dr. Katz regarding the UAI delegate position.

7. ACLS does not regularly transact or otherwise conduct business in New Jersey.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: April 2, 2021

A handwritten signature in blue ink, appearing to read 'J. Shulman', is written above a horizontal line.

James Shulman

CERTIFICATE OF SERVICE

I, Michael F. Buchanan, hereby certify, pursuant to 28 U.S.C. § 1746, that on April 2, 2021, I electronically filed the foregoing Declaration of James Shulman in Support of Motion to Dismiss of American Council of Learned Societies with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

Dated: April 2, 2021

By: /s/ Michael F. Buchanan
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